

## Spencer & Associates

5956 Sherry Lane, Suite 2000  
Dallas, Texas 75225

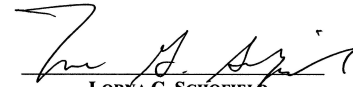
January 4, 2022

BY ECF and EMAIL

Honorable Lorna G. Schofield  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Application Granted. The Clerk of the Court is directed to terminate the letter motion at docket number 40.

Dated: January 5, 2022  
New York, New York



LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE

Re: 21-cr-138, United States v. Jimmy Gale Watson, Jr., Unopposed Request for  
Variance to Conditions for Release

Dear Judge Schofield:

Please accept this letter motion on behalf of Jimmy Gale Watson for a temporary variance to the Conditions of Release issued by this Court regarding Mr. Watson's travel.

Mr. Watson currently is limited to travel between his home district in the Northern District of Texas and the Southern District of New York. Mr. Watson's probation Officer reports that Mr. Watson has not had any violations of any terms of the Conditions of Release since being placed under supervision on March 9, 2021.

Mr. Watson is a veteran, having completed tours of duty in the United States Navy and the United States Marine Corp. This Court previously granted Mr. Watson permission to travel and participate in two, Operation Restored Warrior programs. Operation Restored Warrior is a Christian-based program designed to help combat veterans recover from the negative effects of combat. His previous events were on June 24-28, 2021 and October 31 to November 3, 2021. Mr. Watson completed both previously-granted trips without incident and returned to Texas.

Operation Restored Warrior has again invited Mr. Watson to participate in a retreat sponsored by the same organization. This program is a conference in Plant City, Florida, outside of Tampa, on January 8, 2022.

I respectfully request that this Court approve a one-time variance from the Conditions of Release and allow Mr. Watson to travel to and from the District of Florida in order to attend the Operation Restored Warrior session during January 7-9m, 2022. Mr. Watson and his counsel

have contacted his supervising Probation Officer in the Northern District of Texas and the Assistant United States Attorney in the Southern District of New York. The Probation Officer indicated her support, but indicated the Court, and not the Probation Office, was the proper party to allow this variance. The Asst. U.S. Attorney has not responded to the admittedly, last-minute, inquiry.

Respectfully Submitted,

/s/

Arnold A. Spencer  
Counsel for Jimmy Gale Watson, Jr.

Cc: Kiersten Fletcher, AUSA - SDNY  
Elizabeth Hanft, AUSA - SDNY  
Jaime Espinosa, USPO - NDTX